

ATTACHMENT (5).TXT

National Organic Standards Board

c/o Arthur Neil

Room 4008-South Building

1400 Independence Avenue SW

Washington, DC, 20250-0001

Re: Support of the NOSB's draft pasture guidance document

Dear NOSB Members,

I am writing to express full support for the NOSB's draft guidance document regarding pasture requirements for the National Organic Program. I have the expectation that the USDA organic seal represents the true meaning of "organic" which includes pasturing of animals as required by the National Organic Program Standards.

I request that the NOSB approve the draft pasture guidance document as written including: "Ruminant livestock shall graze pasture during the months of the year when pasture can provide edible forage. The Organic System Plan shall have the goal of providing grazed feed greater than 30% dry matter intake on a daily basis during the growing season but not less than 120 days. The Organic System Plan shall include a timeline showing how the producer will satisfy the goal to maximize the pasture component of total feed used in the farm system."

Lack of enforcement, on some operations, of the current Rule requirement for the pasturing of ruminants, including lactating dairy cows, has led to the necessity for the inclusion of the above numerical standards in the guidance document. Without clear, definitive wording, the intent of the Rule, with regards to pasture, will continue to be disregarded by some. This wording gives certifiers an explicit minimum amount of grazing intake and minimum allowable grazing season that will serve as a clear-cut trigger/guide in their certification process.

I firmly believe requiring significant pasture intake for ruminants, as this document promotes, represents a sustainable agricultural system, providing multiple benefits to the animals, environment and the consumers of organic products. Providing cows with access to pasture assures that organic principles are being met, with an interrelated system between the animals and the land, working from the soil up to promote an interdependent community. Pasture provides benefits to cows that include improved foot and leg strength, reduced breeding problems, less stress, lower culling rates, and enhanced immunity. Ruminants with access to pasture help ensure an organic production system that provides living conditions that allow animals to satisfy their natural behavior patterns, provides the animals with preventative health care benefits, and improves humane animal care and their welfare.

These benefits are passed down to consumers through more nutritious milk. A recent study conducted by the Danish Institute of Agricultural Research tested milk from cows farmed organically and found that it was 50% higher in Vitamin E, 75% higher in beta carotene and higher in omega 3 essential fatty acids than conventional milk. This study tied these qualities to organic cows having room to graze and a diet high in fresh grass and clover, and forage.

Allowing cows to go to their feed rather than bringing feed to the cows

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substantially reduces the use of non-renewable resources and machinery required for feed transportation and ecological manure recycling. Responsible active management of quality pasture is an excellent way to improve soil quality. Careful management of pasture ensures maximum utilization and capture of solar energy, the basis of growing food.

I support the NOSB pasture guidance document and thank you for including clear, definitive minimums. The standards for organic farms and food marketed under the USDA organic seal must not be compromised.

Sincerely,

Jonathan von Ranson  
farmer ☒ organic consumer

I am an: ☐ organic dairy

6 Lockes Village Rd.

Wendell MA 01379

NOSB Livestock Committee Recommendation for Guidance  
Pasture Requirements for the National Organic Program  
March 2, 2005

#### Introduction

The USDA National Organic Program (NOP) has requested NOSB provide guidance concerning the pasture requirements of the National Organic Program that the NOP can review and distribute to accredited certifying agents and post on the NOP website.

The NOSB is seeking comments on organic system plan requirements; temporary confinement; and what constitutes <sup>3</sup>appropriate pasture conditions.<sup>2</sup> In particular, the NOSB seeks input on specific dry matter intake from pasture language; reference to regional NRCS prescribed grazing standards; and whether or not any of the text below should be recommended to the NOP for rule change.

#### Guidance for interpretation of §205.239(a)(2)

##### A. Organic System Plan

Ruminant livestock shall graze pasture during the months of the year when pasture can provide edible forage. The Organic System Plan shall have the goal of providing grazed feed greater than 30% dry matter intake on a daily basis during the growing season but not less than 120 days. The Organic System Plan shall include a timeline showing how the producer will satisfy

the goal to maximize the pasture component of total feed used in the farm system. For livestock operations with ruminant animals, the operation's Organic System Plan shall describe: 1) the amount of pasture provided per animal; 2) the average amount of time that animals are grazed on a daily basis; 3) the portion of the total feed requirement that will be provided from pasture; 4) circumstances under which animals will be temporarily confined; and 5) the records that are maintained to demonstrate compliance with pasture requirements.

B. Temporary Confinement

Temporary confinement means the period of time when ruminant livestock are denied pasture. The length of temporary confinement will vary according to the conditions on which it is based (such as the duration of inclement weather) and instances of temporary confinement shall be the minimum time necessary. In no case shall temporary confinement be allowed as a continuous production system. All instances of temporary confinement shall be documented in the Organic System Plan and in records maintained by the operation.

Temporary confinement is allowed only in the following situations:

- 1) During periods of inclement weather such as severe weather occurring over a period of a few days during the grazing season;
- 2) Conditions under which the health, safety, or well being of an individual animal could  
be jeopardized, including to restore the health of an individual animal or to prevent  
the spread of disease from an infected animal to other animals;
- 3) To protect soil or water quality

C) Appropriate Pasture Conditions

Appropriate pasture conditions shall be determined in accordance with the regional Natural Resources Conservation Service Conservation Practice Standards for Prescribed Grazing (Code 528) for the number of animals in the Organic Systems Plan.

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